

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
LUFKIN DIVISION

**ISMAEL ARREOLA and ISRAEL ARREOLA
Each Individually and on Behalf of All
Others Similarly Situated**

PLAINTIFFS

vs.

No. 9:23-cv-50-MJT

**SOUTHERN INDUSTRIAL CONTRACTORS,
LLC, and SAMUEL ESTIS**

DEFENDANTS

MOTION FOR EXTENSION OF TIME FOR SERVICE OF PROCESS

Plaintiffs Ismael Arreola and Israel Arreola ("Plaintiffs"), each individually and on behalf of all others similarly situated, by and through their undersigned counsel, for their Motion for Extension of Time for Service of Process ("Motion"), state and allege as follows:

1. Plaintiffs make this request in good faith; this Motion is made for good cause and not for the purpose of delay.
2. On March 14, 2023, Plaintiffs filed their Original Complaint against Defendants Southern Industrial Contractors LLC and Samuel Estis.
3. Plaintiffs' original deadline to serve Defendants is June 12, 2023.
4. Plaintiffs engaged a process server on or around March 17, 2023, but efforts to serve Defendants have continued to be unsuccessful.
5. The process server has tried multiple different addresses, but service has been unsuccessful.
6. ABC Legal Services opened an investigation to investigate possible service addresses. On May 31, 2023, a new service address was discovered, and a server was

dispatched to that address.

7. Plaintiffs believe that with additional time and continued diligent efforts, Defendants will be successfully served.

8. For the good cause shown, Plaintiffs seek a 90-day extension to serve process on Defendants.

9. Defendants will not be harmed or prejudiced if this Court grants the relief requested herein.

WHEREFORE, premises considered, Plaintiffs respectfully request that this Court enter an Order allowing them an additional 90 days, up to and including September 11, 2023, in which to serve the Summons and Original Complaint on Defendants, and for any other relief that the Court deems just and proper.

Respectfully submitted,

**ISMAEL ARREOLA and ISRAEL
ARREOLA, Each Individually and on
Behalf of All Others Similarly
Situated, PLAINTIFFS**

SANFORD LAW FIRM, PLLC
Kirkpatrick Plaza
10800 Financial Centre Pkwy, Suite 510
Little Rock, Arkansas 72211
Telephone: (501) 221-0088
Facsimile: (888) 787-2040

/s/ Colby Qualls
Colby Qualls
Ark. Bar No. 2019246
colby@sanfordlawfirm.com

/s/ Josh Sanford
Josh Sanford
Tex. Bar No. 24077858
josh@sanfordlawfirm.com